

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UMG RECORDINGS, INC., CAPITOL
RECORDS, LLC, SONY MUSIC
ENTERTAINMENT, ARISTA MUSIC, ARISTA
RECORDS LLC, ATLANTIC RECORDING
CORPORATION, RHINO ENTERTAINMENT
COMPANY, WARNER MUSIC INC., WARNER
MUSIC INTERNATIONAL SERVICES
LIMITED, WARNER RECORDS INC.,
WARNER RECORDS LLC, and WARNER
RECORDS/SIRE VENTURES LLC,

Plaintiffs,

v.

UNCHARTED LABS, INC., d/b/a Udio.com, and
JOHN DOES 1-10,

Defendant.

Case No. 1:24-cv-04777-AKH-SLC

Hon. Alvin K. Hellerstein

~~PROPOSED~~ STIPULATION AND ORDER
EXTENDING TIME TO RESPOND TO COMPLAINT

Plaintiffs UMG Recordings, Inc., Capitol Records, LLC, Sony Music Entertainment, Arista Music, Arista Records LLC, Atlantic Recording Corporation, Rhino Entertainment Company, Warner Music Inc., Warner Music International Services Limited, Warner Records Inc., Warner Records LLC, Warner Records/SIRE Ventures LLC (“Plaintiffs”), and Uncharted Labs, Inc. (“Udio,” and collectively with Plaintiffs, the “Parties”) jointly submit¹ this stipulation to extend the time for Udio to respond to Plaintiffs’ Complaint.

¹ Pursuant to Rule 8.5 of the Southern District of New York Electronic Case Filing Rules & Instructions, the parties affirm that electronic signatures are being used with consent of all parties.

WHEREAS, on June 24, 2024, Plaintiffs filed their Complaint in the Southern District of New York (ECF No. 1);

WHEREAS, prior to serving Udio on June 27, 2024, Plaintiffs did not request a waiver of service pursuant to Federal Rule of Civil Procedure 4(d);

WHEREAS, pursuant to Federal Rule of Civil Procedure 12(a)(1)(A)(i), Udio's current deadline to answer or otherwise respond to the Complaint is July 18, 2024;

WHEREAS, pursuant to Local Civil Rule 6.1, Plaintiffs' current deadline to file an opposition is August 1, 2024, and Udio's current deadline to reply to such opposition is August 8, 2024;

WHEREAS, the Parties have conferred and wish to extend the time for Udio to answer or otherwise respond to the Complaint;

WHEREAS, Udio has not previously requested or received time for an extension to answer or otherwise respond to the Complaint in this action;

WHEREAS, no scheduling order is in place and no other case deadlines have been entered;

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the Parties, that:

1. Udio shall answer or otherwise respond to Plaintiffs' Complaint by August 1, 2024.
2. If Udio moves to dismiss by August 1, 2024, Plaintiffs may have an extension of two weeks to file an opposition, due on August 29, 2024.
3. Udio may have an extension of one week to file a reply to such opposition, due on September 12, 2024.
4. This stipulation is without prejudice to any and all defenses Udio may assert in this action, and without prejudice to any and all claims Plaintiffs may assert in this action.

5. This stipulation does not otherwise affect or amend any other case deadlines or prevent any party from seeking any appropriate relief including, without limitation, expedited discovery.

Dated: July 10, 2024
New York, New York

Respectfully submitted,

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*Counsel for Defendant Uncharted Labs, Inc.,
d/b/a Udio.com*

SO ORDERED this 11 day of July, 2024



The HONORABLE ALVIN K. HELLERSTEIN
United States District Judge